Mr. Joseph A. LaManna DaimlerChrysler Corporation Kokomo Transmission Plant 2401 South Reed Road Kokomo, Indiana 46904

Re: 067-14232-00065

Minor Source Modification to:

Part 70 permit No.: T067-6504-00065

Dear Mr. LaManna:

DaimlerChrysler Corporation was issued Part 70 operating permit T067-6504-00065 on September 1, 1999 for operation of aluminum parts casting and the manufacture of various parts for automobile and light duty truck transmissions. An application to modify the source was received on April 4, 2001. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

Activities or categories not previously identified with emissions less than or equal to insignificant thresholds:

Machining operation consisting of one hundred and five (105) wet machines, identified as Wet Mach, and each machine with maximum air flow rate of 750 actual cubic feet per minute (acfm).

The following construction conditions are applicable to the proposed project:

#### **General Construction Conditions**

- 1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to <u>any</u> proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).
- 2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
- 3. <u>Effective Date of the Permit</u> Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
- 4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

- 5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
- 6. Pursuant to 326 IAC 2-7-10.5(I) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction and operation when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 operating permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(I)(2) and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter please contact Adeel Yousuf, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (973) 575-2555, ext. 3252 or dial (800) 451-6027, press 0 and ask for 3-6878.

Sincerely,

Paul Dubenetzky, Chief Permits Branch Office of Air Management Original Signed by Paul Dubenetzky

Attachments AY/EVP

cc: File - Howard County U.S. EPA, Region V

Howard County Health Department

Air Compliance Section Inspector - Ryan Hillman

Compliance Data Section - Karen Nowak

Administrative and Development - Janet Mobley Technical Support and Modeling - Michele Boner

# PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR QUALITY

## DaimlerChrysler Corporation 2401 South Reed Road Kokomo, Indiana 46904

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

| Operation Permit No.: 067-6504-00065  |  |  |  |  |  |
|---|--|--|--|--|--|
| Issued by:<br>Janet G. McCabe, Assistant Commissioner<br>Office of Air Quality  | Issuance Date: September 1, 1999   |  |  |  |  |
| 1 <sup>st</sup> Administrative Amendment 067-11399-00065<br>2 <sup>nd</sup> Administrative Amendment 067-11981-00065<br>3 <sup>rd</sup> Administrative Amendment 067-13661-00065<br>1 <sup>st</sup> Significant Source Mod. 067-12243-00065 | Issuance Date: November 9, 1999 Issuance Date: April 27, 2000 Issuance Date: March 26, 2000 Issuance Date: January 4, 2001 |  |  |  |  |
| First Minor Source Modification: 067-14232-<br>00065  | Pages Affected: 7, 11, 53 Pages added: 53f   |  |  |  |  |
| Issued by: Original Signed by Paul Dubenetzky<br>Paul Dubenetzky, Branch Chief<br>Office of Air Quality   | Issuance Date: May 2, 2001   |  |  |  |  |

DaimlerChrysler Corporation Kokomo, Indiana Permit Reviewer: Peggy Zukas First Minor Source Modification 067-14232-00065 Amended By: AY/EVP

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OP No. T67-6504-00065

#### **SOURCE SUMMARY SECTION A**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

## General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates machining, cleaning, and heat treating facilities to produce transmissions for use in automobiles and light duty trucks. The DaimlerChrysler Corporation Kokomo Transmission Plant and DaimlerChrysler Corporation Kokomo Casting Plant have been considered a single Title V major source. The combined source ID for the source is 067-00065.

Responsible Official: Joseph A. LaManna

Source Address: DaimlerChrysler Corporation Kokomo Transmission Plant

2401 S. Reed Road, Kokomo, Indiana 46904

DaimlerChrysler Corporation Kokomo Casting Plant Source Address:

1001 East Boulevard, Kokomo, Indiana 46904

Mailing Address: DaimlerChrysler Corporation, P.O. Box 9007

Kokomo, Indiana 46904-9007

SIC Code: 3714 County Location: Howard

County Status: Attainment for all criteria pollutants

Source Status: Part 70 Permit Program

Major Source, under PSD

Major Source, Section 112 of the Clean Air Act

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

The Permittee owns and operates machining, cleaning, and heat treating facilities to produce transmissions for use in automobiles and light duty trucks. The DaimlerChrysler Corporation Kokomo Transmission Plant and DaimlerChrysler Corporation Kokomo Casting Plant have been considered a single Title V major source. The DaimlerChrysler Corporation Kokomo Casting Plant was issued a separate Title V permit under the Part 70 No. T067-5246-00065.

This DaimlerChrysler Corporation Kokomo Transmission Plant consists of the following emission units and pollution control devices:

- 1. One (1) spreader stoker boiler, identified as boiler 1, segment ID 1, fueled by coal, maximum heat capacity is 47 MMBtu per hour, using a cyclone as control, exhausting to the common stack boiler.
- 2. One (1) spreader stoker boiler, identified as boiler 2, segment ID 1, fueled by coal, maximum heat capacity is 47 MMBtu per hour, using a cyclone as control, exhausting to the common stack boiler.
- 3. One (1) spreader stoker boiler, identified as boiler 3, segment ID 1, fueled by coal, maximum heat capacity is 47 MMBtu per hour, using a cyclone as control, exhausting to the common stack boiler.
- 4. One (1) boiler, identified as boiler 4, segment ID 1, fueled by reclaimed residual oil, and segment ID 2, fueled by natural gas, maximum heat capacity is 90 MMBtu per hour, and exhausting to the common stack boiler.

DaimlerChrysler Corporation Kokomo, Indiana Permit Reviewer: Peggy Zukas

#### First Minor Source Modification 067-14232-00065 Amended By: AY/EVP

Page 11 of 60 OP No. T67-6504-00065

- 41. Tinning
- 42. WWTP Sulfuric Acid Storage
- Ink usage, identified as ink, segment ID 1.
- 44. Floor cleaner, identified as MAINTFC, segment ID 1.
- 45. Multiple individual machining operations, identified as MACH, segment ID 1, consisting of an oil mist from cutting oil, synthetic grinding coolant, and drilling oil, using air washers (scrubbers), and dust collectors as control.
- 46. Activities or categories not previously identified with emissions less than or equal to insignificant thresholds:

Machining operations consisting of one hundred and five (105) wet machines, identified as Wet Mach, and each machine with maximum air flow rate of 750 actual cubic feet per minute (acfm).

## A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 Applicability).

**SECTION D.12** 

#### First Minor Source Modification 067-14232-00065 Amended By: AY/EVP

Page 53f of 60

OP No. T67-6504-00065

### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]:

Activities or categories not previously identified with emissions less than or equal to insignificant thresholds:

Machining operations consisting of one hundred and five (105) wet machines, identified as Wet Mach, and each machine with maximum air flow rate of 750 actual cubic feet per minute (acfm).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-7-10.5, WITH CONDITIONS LISTED BELOW.

#### **Construction Conditions**

#### **General Construction Conditions**

D.12.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

#### **Effective Date of the Permit**

- D.12.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.12.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications pursuant to 326 IAC 2.

#### **Operation Conditions**

## Emission Limitations and Standards [326 IAC 2-7-5(1)]

## D.12.4 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Particulate Emission Limitations), each wet machine shall not allow or permit discharge to the atmosphere particulate matter in excess of 0.03 grains per dry standard cubic foot (gr/dscf).

#### D.12.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Any change or modification which may increase the potential VOC emissions to 25 tons per year or more from the fluid application to the wet machines covered in this permit must be approved by the Office of Air Quality (OAQ) and be subject to 326 IAC 8-1-6 (General Reduction Requirements) before such change may occur.

## Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

There are no Compliance Monitoring Requirements applicable to this emission unit.

Mail to: Permit Administration & Development Section
Office Of Air Quality
100 North Senate Avenue
P. O. Box 6015 Indianapolis, Indiana 46206-6015

DaimlerChrysler Corporation P.O. Box 595 Goshen, Indiana 46527

## **Affidavit of Construction**

| l,  | , being duly sworn upon my oath, depose and say:  (Name of the Authorized Representative)                       |                         |                            |                                       |                      |  |  |
|---|---|-------------------------|----------------------------|---------------------------------------|----------------------|--|--|
| (Name o   | of the Authorized Representative  | <del>:</del> )          |                            |                                       |                      |  |  |
| 1.  | I live in   | (                       | County, Indiana and        | being of sound mind a                 | nd over twenty-one   |  |  |
|   | (21) years of age, I am compe   | etent to give this affi | idavit.                    |                                       |                      |  |  |
| 2.  | I hold the position of  |                         | for                        |                                       |                      |  |  |
|   | I hold the position of  | (Title)                 |                            | (Company Nam                          | e)                   |  |  |
| 3.  | By virtue of my position with _   |                         | (Company Name)             | ,I have personal                      |                      |  |  |
|   | knowledge of the representati   | ons contained in thi    | is affidavit and am a      | uthorized to make                     |                      |  |  |
|   | these representations on beha   | alf of                  | /Compo                     | · · · · · · · · · · · · · · · · · · · |                      |  |  |
|   |   |                         | (Сотра                     | ny Name)                              |                      |  |  |
| 4.  | I hereby certify that DaimlerCh construction of the three (3) sp  | •                       |                            |                                       | ·                    |  |  |
|   | in conformity with the requirements and intent of the construction permit application received by the Office of |                         |                            |                                       |                      |  |  |
|   | Air Quality on February 23, 20  | 01 and as permitte      | d pursuant to <b>Minor</b> | Source Modification                   | 067-14232, Plant     |  |  |
|   | ID No. 067-00065 issued on  |                         |                            |                                       |                      |  |  |
|   |   |                         |                            |                                       |                      |  |  |
| - u   |   |                         |                            |                                       |                      |  |  |
| Further Affiant sa<br>I affirm under pen<br>and belief. | id not.<br>alties of perjury that the repre   | sentations contain      | ed in this affidavit a     | are true, to the best of              | f my information     |  |  |
| and belief.   |   | Signatui                | ra                         | _                                     |                      |  |  |
|   |   | Signatui                |                            |                                       |                      |  |  |
|   |   | Date                    |                            |                                       |                      |  |  |
| STATE OF INDIA  | ,   |                         |                            |                                       |                      |  |  |
| ,   | SS  |                         |                            |                                       |                      |  |  |
| COUNTY OF   | )   |                         |                            |                                       |                      |  |  |
| Subscril  | ped and sworn to me, a notary   | public in and for       |                            | Count                                 | y and State of       |  |  |
| Indiana on this _                                       | day of  | f                       | , 20                       | •                                     |                      |  |  |
| My Commission 6   | expires:  |                         |                            |                                       |                      |  |  |
|   |   |                         | Cianatura                  |                                       |                      |  |  |
|   |   |                         | Signature                  |                                       |                      |  |  |
|   |   |                         | Name (typed or p           |                                       | ). Affidavit wnd 7/0 |  |  |

Section 10: Affidavit.wpd 7/00

# Indiana Department of Environmental Management Office of Air Quality

## Technical Support Document (TSD) for a Minor Source Modification to a Part 70 Operating Permit

## **Source Background and Description**

**Source Name:** DaimlerChrysler Corporation

Source Location: 2401 South Reed Road, Kokomo, Indiana 46904

County: Howard SIC Code: 3714

Operation Permit No.: 067-6504-00065
Operation Permit Issuance Date: September 1, 1999
Permit Modification No.: 067-14232-00065
Permit Reviewer: Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed a modification application from DaimlerChrysler Corporation relating to the construction and operation of wet machines used in the aluminum parts casting, and the manufacture of various parts for automobile and light duty truck transmissions. The source also requested to amend the responsible official name at the source.

#### **Insignificant Activities for the Modification**

The application consists of the following insignificant activity, as defined in 326 IAC 2-7-1(21): Activities or categories not previously identified with emissions less than or equal to insignificant thresholds:

Machining operation consisting of one hundred and five (105) wet machines, identified as Wet Mach, and each machine with maximum air flow rate of 750 actual cubic feet per minute (acfm).

#### **History**

On April 4, 2001, DaimlerChrysler submitted an application to the OAQ requesting to add additional wet machines to their existing plant. DaimlerChrysler was issued a Part 70 permit on September 1, 2001.

#### **Source Definition**

This aluminum parts casting, and the automobile and light duty transmission manufacturing plant consists of two (2) plants: The Chrysler Kokomo Transmission plant has been combined with DaimlerChrysler Kokomo Casting plant.

- (a) Plant 1 is located at Kokomo Transmission Plant (KTP), 2401 South Reed Road, Kokomo, Indiana 46904; and
- (b) Plant 2 is located at Kokomo Casting Plant (KCP), 1001 East Boulevard, Kokomo, Indiana 46904.

A separate part 70 permit T067-6504-00065 was issued for the DaimlerChrysler Kokomo Transmission Plant, where a determination was that these two (2) plants are one (1) source. This one source determination also applies for PSD purposes. The DaimlerChrysler Kokomo Casting Plant was also issued a separate part 70 permit (T067-5246-00065) solely for administrative purposes.

## **Existing Approvals**

The source was issued a Part 70 Operating Permit (T067-6504-00065) on September 1, 1999. The source has since received the following:

- (a) First Administrative Amendment No.: 067-11399, issued on November 9, 1999; and
- (b) Second Administrative Amendment No.:067-11981, issued April 27, 2000; and
- (c) Third Administrative Amendment No.: 067-13661, issued on March 26, 2000; and
- (d) First Significant Source Modification No.: 067-12243, issued January 4, 2001.

#### **Enforcement Issue**

There are no enforcement actions pending.

#### Recommendation

The staff recommends to the Commissioner that the Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 4, 2001.

## **Emission Calculations**

See Appendix A of this document for detailed emissions calculations (two (2) pages).

## **Potential To Emit Before Controls (Modification)**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

| Pollutant       | Potential To Emit (tons/year) |
|-----------------|-------------------------------|
| PM              | 14.33                         |
| PM-10           | 14.33                         |
| SO <sub>2</sub> | 0.00                          |
| VOC             | 1.23                          |
| CO              | 0.00                          |
| NO <sub>v</sub> | 0.00                          |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

| HAP's        | Potential To Emit (tons/year) |
|--------------|-------------------------------|
| Formaldehyde | 0.01                          |
| TOTAL        | 0.01                          |

#### Potential to Emit After Controls for the Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

|                                 |        | Potential to Emit<br>(tons/year) |                 |        |     |     |               |               |
|---------------------------------|--------|----------------------------------|-----------------|--------|-----|-----|---------------|---------------|
| Process/facility                | PM     | PM-10                            | SO <sub>2</sub> | VOC    | СО  | NOx | Single<br>HAP | Total<br>HAPs |
| 105 wet machines                | 14.33  | 14.33                            | ı               | 1.23   | ı   | -   | 0.01          | 0.01          |
| Total Emissions                 | 14.33  | 14.33                            | -               | 1.23   | -   | 1   | 0.01          | 0.01          |
| Total Source (new and existing) | < 25.0 | < 15.0                           | N/A             | < 25.0 | N/A | N/A | < 10.0        | < 25.0        |

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

#### **Justification for the Modification**

The Title V permit is being modified through a Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d) because the potential to emit PM and PM-10 is less than twenty-five (25) tons per year, but greater than five (5) tons per year. This Minor Source Modification is approval to construct and operate the new emission unit.

## **County Attainment Status**

The source is located in Howard County.

| Pollutant       | Status     |  |
|-----------------|------------|--|
| PM-10           | attainment |  |
| SO <sub>2</sub> | attainment |  |
| $NO_2$          | attainment |  |
| Ozone           | attainment |  |
| СО              | attainment |  |
| Lead            | attainment |  |

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and  $NO_x$  emissions are considered when evaluating the rule applicability relating to the ozone standards. Howard County has been designated as attainment or unclassifiable for ozone.

## Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

## State Rule Applicability - Entire Source

## 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM, PM-10, CO and NOx. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

## 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

## State Rule Applicability - Individual Facilities

## 326 IAC 2-4.1-1 (New Source Toxics Control)

326 IAC 2-4.1-1 applies to new or reconstructed facilities with potential emissions of any single HAP equal or greater than ten (10) tons per twelve (12) month period and potential emissions of a combination of HAPs greater than or equal to twenty-five (25) tons per twelve (12) month period. This modification is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) because it has potential single HAP and total HAPs emission of less than 10 and 25 tons per year, respectively.

#### 326 IAC 6-1-2 (Particulate Emission Limitations)

Pursuant to 326 IAC 6-1-2 (Particulate Emission Limitations), one hundred and five (105) wet machines shall not allow or permit discharge to the atmosphere particulate matter in excess of 0.03 grains per dry standard cubic foot (gr/dscf).

#### 326 IAC 6-3-2 (Process Operations)

The process operations at the source are subject to the requirement of 326 IAC 6-1-2. Therefore, pursuant to 326 IAC 6-1-2, the requirements of 326 IAC 6-3-2 do not apply.

#### 326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

Pursuant to 326 IAC 8-1-6, new facilities located anywhere in the state that were constructed on or after January 1, 1980, which have a potential to emit (PTE) VOC at 25 tons or more per year, and which are not otherwise regulated by another provision of Article 8, are subject to the rule requirements. The fluid application to the wet machines is not subject to 326 IAC 8-1-6, because potential VOC emissions of 1.23 tons per year are below 25 tons per year.

## 326 IAC 8 (Volatile Organic Sources)

There are no other provisions in article 8 that will apply to the wet machining operation.

DaimlerChrysler Corporation Kokomo, Indiana Permit Reviewer: AY/EVP Page 5 of 7 T067-6504-00065 Minor Source Modification #:067-14232-00065

## **Compliance Requirements**

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The are no compliance monitoring requirements applicable to the wet machines.

#### Conclusion

This modification shall be subject to the conditions of the attached **Part 70 Minor Source Modification Permit No. 067-14232-00065.** 

#### **Proposed Permit Changes**

Name of the responsible has been changed in section A of the permit.

## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management Quality (OAMQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

#### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates machining, cleaning, and heat treating facilities to produce transmissions for use in automobiles and light duty trucks. The DaimlerChrysler Corporation Kokomo Transmission Plant and DaimlerChrysler Corporation Kokomo Casting Plant have been considered a single Title V major source. The combined source ID for the source is 067-00065.

Responsible Official: Kenneth Moore Joseph A. LaManna

Source Address: DaimlerChrysler Corporation Kokomo Transmission Plant

2401 S. Reed Road, Kokomo, Indiana 46904

Source Address: DaimlerChrysler Corporation Kokomo Casting Plant

1001 East Boulevard, Kokomo, Indiana 46904

Mailing Address: DaimlerChrysler Corporation, P.O. Box 9007

Kokomo, Indiana 46904-9007

DaimlerChrysler Corporation Kokomo, Indiana Permit Reviewer: AY/EVP Page 6 of 7 T067-6504-00065 Minor Source Modification #:067-14232-00065

SIC Code: 3714 County Location: Howard

County Status: Attainment for all criteria pollutants

Source Status: Part 70 Permit Program Major Source, under PSD

Major Source, Section 112 of the Clean Air Act

The one hundred and five (105) wet machines have been added to Section A.2.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

46. Activities or categories not previously identified with emissions less than or equal to insignificant thresholds:

Machining operations consisting of one hundred and five (105) wet machines, identified as Wet Mach, and each machine with maximum air flow rate of 750 actual cubic feet per minute (acfm).

Section D.12 has been added to the permit to include the operation conditions for the proposed one hundred and five (105) wet machines.

#### SECTION D.12 FACILITY OPERATION CONDITIONS

## Facility Description [326 IAC 2-7-5(15)]:

Activities or categories not previously identified with emissions less than or equal to insignificant thresholds:

Machining operations consisting of one hundred and five (105) wet machines, identified as Wet Mach, and each machine with maximum air flow rate of 750 actual cubic feet per minute (acfm).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-7-10.5, WITH CONDITIONS LISTED BELOW.

#### **Construction Conditions**

#### **General Construction Conditions**

D.12.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

#### **Effective Date of the Permit**

D.12.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

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D.12.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications pursuant to 326 IAC 2.

#### **Operation Conditions**

Emission Limitations and Standards [326 IAC 2-7-5(1)]

## D.12.4 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Particulate Emission Limitations), each wet machine shall not allow or permit discharge to the atmosphere particulate matter in excess of 0.03 grains per dry standard cubic foot (gr/dscf).

## D.12.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Any change or modification which may increase the potential VOC emissions to 25 tons per year or more from the fluid application to the wet machines covered in this permit must be approved by the Office of Air Quality (OAQ) and be subject to 326 IAC 8-1-6 (General Reduction Requirements) before such change may occur.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

There are no Compliance Monitoring Requirements applicable to this emission unit.

## **Appendix A: Emission Calculations**

Company Name: Daimler Chrysler Corporation

Address City IN Zip: 2401 South Reed Road, Kokomo, Indiana 46904

CP: 067-14232 Plt ID: 067-00065

Reviewer: Adeel Yousuf / EVP

## **Uncontrolled Potential Emissions (tons/year)**

|                       | Emissions Generating Activity |       |  |  |  |  |  |
|-----------------------|-------------------------------|-------|--|--|--|--|--|
| Pollutant             | Wet Machines                  | TOTAL |  |  |  |  |  |
|                       |                               |       |  |  |  |  |  |
| PM                    | 14.33                         | 14.33 |  |  |  |  |  |
| PM10                  | 14.33                         | 14.33 |  |  |  |  |  |
| SO2                   | 0.00                          | 0.00  |  |  |  |  |  |
| NOx                   | 0.00                          | 0.00  |  |  |  |  |  |
| VOC                   | 1.23                          | 1.23  |  |  |  |  |  |
| СО                    | 0.00                          | 0.00  |  |  |  |  |  |
| total HAPs            | 0.01                          | 0.01  |  |  |  |  |  |
| worst case single HAP | (Formaldehyde) 001            | 0.01  |  |  |  |  |  |
|                       |                               |       |  |  |  |  |  |

Total emissions based on rated capacity at 8,760 hours/year.

## **Controlled Potential Emissions (tons/year)**

| Pollutant             | Wet Machines       | TOTAL |  |
|-----------------------|--------------------|-------|--|
| PM                    | 14.33              | 14.33 |  |
| PM10                  | 14.33              | 14.33 |  |
| SO2                   | 0.00               | 0.00  |  |
| NOx                   | 0.00               | 0.00  |  |
| VOC                   | 1.23               | 1.23  |  |
| СО                    | 0.00               | 0.00  |  |
| total HAPs            | 0.01               | 0.01  |  |
| worst case single HAP | (Formaldehyde) 001 | 0.01  |  |

Total emissions based on rated capacity at 8,760 hours/year, after control.

# Appendix A: Emission Calculations Machining Operations

Company Name: Daimler Chrysler Corporation

Address City IN Zip: 2401 South Reed Road, Kokomo, Indiana 46904

CP: 067-14232 Plt ID: 067-00065

Reviewer: Adeel Yousuf / EVP

Date: 05/03/2001

## A. Potential PM emissions from Wet Machining operation

Number of Wet Machines: 105

|           | Maximum fluid usage per |                        | Potential emission rate | Potential emission rate per | Total Potential emissions |
|-----------|-------------------------|------------------------|-------------------------|-----------------------------|---------------------------|
| Pollutant | machine (lb/hr)         | PM Emission Factor (%) | per wet machine (lb/hr) | wet machine (TPY)           | for 105 machines (TPY)    |
| PM        | 0.89                    | 3.5                    | 0.031                   | 0.136                       | 14 326                    |

#### **B. VOC emissions from Wet Machining Operation**

Number of Wet Machines: 105

| Ī |           |                         |                          |                 |                             |                             |                           |
|---|-----------|-------------------------|--------------------------|-----------------|-----------------------------|-----------------------------|---------------------------|
|   |           | Maximum fluid usage per | •                        |                 | Potential emission rate per | Potential emission rate per | Total Potential emissions |
|   | Pollutant | machine (lb/hr)         | PM emission rate (lb/hr) | VOC Content (%) | wet machine (lb/hr)         | wet machine (TPY)           | for 105 machines (TPY)    |
|   | VOC       | 0.89                    | 0.031                    | 8.59%           | 0.002663                    | 0.011664                    | 1.2247                    |

## C. HAP emissions from Wet Machining Operation

Number of Wet Machines: 105

|              | Maximum fluid usage per | VOC Emission Factor |                 | Potential emission rate per | Potential emission rate per | Total Potential emissions |
|--------------|-------------------------|---------------------|-----------------|-----------------------------|-----------------------------|---------------------------|
| Pollutant    | machine (lb/hr)         | (%)                 | VOC Content (%) | wet machine (lb/hr)         | wet machine (TPY)           | for 105 machines (TPY)    |
| Formaldehyde | 0.89                    | 25                  | 0.01            | 0.000022                    | 0.000097                    | 0.0102                    |

<sup>\*</sup> Formaldehyde is emitted as both VOC and HAP

## D. Potential and Controlled Emissions from Machining Operations

|                  | Potential Emissions | Potential Emissions | Controlled Emissions |                            |
|------------------|---------------------|---------------------|----------------------|----------------------------|
| Pollutant        | (lb/hr)             | (TPY)               | (lb/hr)              | Controlled Emissions (TPY) |
| PM- wet machines | 3.27                | 14.33               | 3.27                 | 14.33                      |
| VOC              | 0.2800              | 1.230               | 0.2800               | 1.230                      |
| HAP              | 0.0023              | 0.010               | 0.0023               | 0.010                      |

Note: 1) Formaldehyde is emitted as both VOC and HAP

2) All emision factors are provided by the source

#### **METHODOLOGY**

Potential Emissions, lbs/hr = Max. Rate (lb/hr) x Emission Factor (%)

Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.